IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

ROOFER'S PENSION FUND, Individually and on Behalf of All Others Similarly Situated,) No. 16-CV-2805-MCA-LDW
Plaintiffs, -vs- PAPA, et al., Defendants.) NOTICE OF PERRIGO'S) MOTION TO SEAL) PORTIONS OF) LETTERS DATED) FEBRUARY 26, 2020)

PLEASE TAKE NOTICE that on April 6, 2020, or as soon thereafter as counsel may be heard, defendant Perrigo Company plc ("Perrigo") shall move before the Honorable Leda Dunn Wettre, Magistrate Judge, United States District Court, District of New Jersey, for an Order pursuant to L. Civ. R. 5.3 sealing the portions of Lead Plaintiffs' letter of February, 26 2020 (ECF 249, filed under temporary seal) and the portions of Defendants' letter of February 26, 2020 (ECF 250, filed under temporary seal) (collectively, the "Letters") that the respective parties identify on the index annexed hereto as Exhibit 1 and granting such further relief as the Court may deem appropriate.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Perrigo relies upon the Declaration of R. David Gallo in Support of Perrigo's Motion to Seal Portions of Letters Dated February 26, 2020, Dated March 11, 2020 and a Letter Brief dated March 11, 2020.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted

herewith.

/s/Alan S. Naar

Alan S. Naar

GREENBAUM ROWE & SMITH

& DAVIS LLP Alan S. Naar 99 Wood Avenue South Iselin, New Jersey 08830 (732) 476-2530 anaar@greenbaumlaw.com

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON LLP

James D. Wareham (pro hac vice) James E. Anklam (pro hac vice) 801 17th Street, NW Washington, DC 20006 (202) 639-7000 james.wareham@friedfrank.com james.anklam@friedfrank.com

Samuel P. Groner (pro hac vice) One New York Plaza New York, New York 10004 (212) 859-8000 samuel.groner@friedfrank.com

Attorneys for Defendant Perrigo Company plc

Dated: March 11, 2020

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Defendants' requested redactions					
Material	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why Less Restrictive Alternative is not available	Prior Sealing	Party in Opposition to Sealing, if any, and basis
Defendants' February 26, 2020 Letter, with respect to the paragraph on page two beginning with "Among the document requests" and ending with "actions shortly thereafter."	Confidentiality	Confidential information regarding Defendant's business operations would be exposed.	Redactions already limited to confidential information.	Yes	No opposition
Defendants' February 26, 2020 Letter, with respect to the final paragraph on page three (continuing onto page four) beginning with "On February 10" and ending with "provided to plaintiffs."	Confidentiality	Confidential information regarding Defendant's business operations would be exposed.	Redactions already limited to confidential information.	Yes	No opposition
Defendants' February 26, 2020 Letter, Attachment A	Non-public discovery materials; Relates to ongoing government investigation.	Non-public discovery materials would be exposed; Sensitive information regarding the Government's investigation would be exposed.	Redactions already limited to confidential and sensitive information.	Yes	No opposition

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Class Plaintiffs' requested redactions					
Material	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why Less Restrictive Alternative is not available	Prior Sealing	Party in Opposition to Sealing, if any, and basis
February 26, 2020 Letter, with respect to the second to last sentence in the final paragraph on page one beginning with "that if the United States" and ending with "deposition should be stayed."	The DOJ asserts that the information relates to ongoing government investigation.	The DOJ asserts that confidential information regarding the Government's investigation would be exposed.	Redactions already limited to sensitive information regarding government investigation.	Yes	No Opposition
February 26, 2020 Letter, with respect to the portion of the first sentence in the first paragraph on page two beginning with "particularized justification" and ending with "be stayed."	The DOJ asserts that the information relates to ongoing government investigation.	The DOJ asserts that confidential information regarding the Government's investigation would be exposed.	Redactions already limited to sensitive information regarding government investigation.	Yes	No Opposition
February 26, 2020 Letter, with respect to the portion of the third sentence in the first paragraph on page two beginning with "all ten" and ending with "stayed."	The DOJ asserts that the information relates to ongoing government investigation.	The DOJ asserts that sensitive information regarding the Government's investigation would be exposed.	Redactions already limited to sensitive information regarding government investigation.	Yes	No Opposition

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Class Plaintiffs' requested redactions cont.					
Material	Basis for Sealing	Clearly Defined and	Why Less Restrictive	Prior	Party in
		Serious Injury that Would	Alternative is not	Sealing	Opposition to
		Result if the Relief is Not	available		Sealing, if
		Granted			any, and basis
February 26, 2020	The DOJ asserts	The DOJ asserts that	Redactions already limited	Yes	No Opposition
Letter, Exhibit 1	that the	sensitive information	to sensitive information		
	information	regarding the Government's	regarding government		
	relates to ongoing	investigation would be	investigation.		
	government	exposed.			
	investigation.				